

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WHITEMAN TO
GREETING CARD ASSOCIATION INTERROGATORY (GCA/USPS-T2-3(A)-(B))**
(May 24, 2021)

The United States Postal Service hereby provides the response of witness Curtis Whiteman to the following interrogatories of the Greeting Card Association (GCA) dated May 14, 2021: GCA/USPS-T2-3(a)-(b). Each interrogatory is stated verbatim and followed by the relevant response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 24, 2021

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WHITEMAN
TO INTERROGATORIES OF GREETING CARD ASSOCIATION**

GCA/USPS-T2-3. Please confirm that, according to the FY 2020 *Public Cost Segments and Components* report, at Cost Segment 14,

(a) Total market-dominant purchased highway transportation cost, net of that cost for First-Class Mail, was \$1,301,131 (000) minus \$602,989 (000) = \$698,142 (000).

(b) Total competitive purchased highway transportation cost was \$1,658,184 (000). If in either case you do not confirm, please provide the correct value and explain the necessary correction.

RESPONSE:

- a. Partially confirmed. The figures above are correct for domestic market dominant products' purchased highway transportation costs.
- b. Partially confirmed. The figures above are correct for domestic competitive products' purchased highway transportation costs.